

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

ERIC CAINE,)	
)	
Plaintiff,)	
)	
v.)	Case No. 11-CV-08996
)	
JON BURGE, JAMES PIENTA,)	Honorable Judge Durkin
RAYMOND MADIGAN, WILLIAM)	
MARLEY, WILLIAM PEDERSON,)	
DANIEL MCWEENY, CITY OF)	
CHICAGO and UNIDENTIFIED)	
EMPLOYEES OF THE CITY OF)	
CHICAGO,)	JURY TRIAL DEMANDED
)	
Defendants.)	

**PLAINTIFF'S EXHIBITS IN SUPPORT OF
LOCAL RULE 56.1 STATEMENT OF ADDITIONAL FACTS**

- Exhibit 1: Caine Certificate of Innocence
- Exhibit 2: Eric Caine Deposition Dated February 7, 2013
- Exhibit 3: Record of Proceedings, *People v. Patterson*, September 25, 1989, Eric Caine Trial Testimony
- Exhibit 4: Order Granting Certificate of Innocence to Aaron Patterson
- Exhibit 5: Aaron Patterson Deposition, *Patterson v. Burge*, Dated December 8, 2005
- Exhibit 6: Supplementary Report Dated April 21, 1986
- Exhibit 7: Supplementary Report Dated May 7, 1986
- Exhibit 8: Jon Burge Deposition Dated December 18, 2012
- Exhibit 9: Raymond Madigan Deposition Dated May 12, 2012
- Exhibit 10: Daniel McWeeny Deposition Dated August 8, 2012

Exhibit 11: William Pedersen Deposition Dated July 10, 2012

Exhibit 12: William Marley Deposition Dated May 29, 2012

Exhibit 13: James Pienta Deposition Dates May 22, 2012

Exhibit 14: Jon Burge Response to Interrogatory #1

Exhibit 15: Jon Burge Response to Interrogatory #2

Exhibit 16: Raymond Madigan Response to Interrogatory #1

Exhibit 17: Raymond Madigan Response to Interrogatory #2

Exhibit 18: Daniel Mcweeny Response to Interrogatory #1

Exhibit 19: Daniel Mcweeny Response to Interrogatory #2

Exhibit 20: William Pedersen Response to Interrogatory #1

Exhibit 21: William Pedersen Response to Interrogatory #2

Exhibit 22: William Marley Response to Interrogatory #1

Exhibit 23: William Marley Response to Interrogatory #2

Exhibit 24: James Pienta Response to Interrogatory #1

Exhibit 25: James Pienta Response to Interrogatory #2

Exhibit 26: Jon Burge Answer to Complaint

Exhibit 27: Raymond Madigan Answer to Complaint

Exhibit 28: Daniel McWeeny Answer to Complaint

Exhibit 29: William Pedersen Answer to Complaint

Exhibit 30: William Marley Answer to Complaint

Exhibit 31: James Pienta Answer to Complaint

Exhibit 32: Jon Burge Personnel Record (Filed Under Seal)

Exhibit 33: Transcript of Proceedings, *United States v. Burge*, Jon Burge Testimony, Dated June 17, 2010

Exhibit 34: Findings and Decision, Before the Police Board of the City of Chicago, In re Jon Burge, No. 91-1856

Exhibit 35: Deposition of Jon Burge in *Wilson v. City of Chicago*, Dated September 22, 1988

Exhibit 36: Court Reported Statement of Lonza Homes, Dated April 19, 2004

Exhibit 37: Report of Proceedings, *Homes v. The People of The State of Illinois*, Testimony of Jon Burge, Dated Feb. 24, 1986

Exhibit 38: Report of Proceedings, *People v. Mumin*, Testimony of Jon Burge, Dated May 13, 1987

Exhibit 39: Initial Incident Report Dated April 19, 1986

Exhibit 40: Report of Proceedings, *People v. Patterson*, Testimony of Dennis McGuire, Dated Sept. 19, 1989

Exhibit 41: Memorandum from William Marley and James Pienta to Jon Burge

Exhibit 42: Court Appearance Authorizations

Exhibit 43: General Progress Reports

Exhibit 44: Affidavit of Michael Arbuckle, *People v. Patterson*

Exhibit 45: Deposition of Michael Arbuckle, *People v. Patterson*, Dated November 19, 2004

Exhibit 46: Affidavit of Aaron Patterson

Exhibit 47: Report of Proceedings, *People v. Patterson*, Testimony of Aaron Patterson, Dated March 3, 1988

Exhibit 48: Report of Proceedings, *People v. Patterson*, Testimony of Peter Troy, Dated Sept. 22, 1989

Exhibit 49: Unsigned Statement Attributed to Aaron Patterson,
Eric Caine's Signed Statement

Exhibit 50: Affidavit of Ike Carothers, *People v. Patterson*

Exhibit 51: Deposition of Richard Burnette Dated January 10, 2013

Exhibit 52: Report of Proceedings, *People v. Patterson*, Testimony of James
Pienta, Dated Sept. 20, 1989

Exhibit 53: Deposition of Eric Caine, *Patterson v. Burge*,
Dated January 18, 2005

Exhibit 54: Affidavit of Dr. Ross W. Romine

Exhibit 55: Report of Proceedings, *People v. Patterson*, Initial Appearance of
Caine and Patterson, Dated May 2, 1986

Exhibit 56: Affidavit of Illya Rowland Affidavit

Exhibit 57: Deposition of Illya Rowland, *Patterson v. Burge*,
Dated November 24, 2004

Exhibit 58: State's Response to Discovery Request

Exhibit 59: Report of Proceedings, *People v. Caine*, Testimony of Peter Troy
Dated Sept. 26, 1989

Exhibit 60: Report of Proceedings, *People v. Caine*, Closing Arguments,
Sept. 26, 1989

Exhibit 61: Reports of Goldston and Sanders

Exhibit 62: Memorandum of Opinion, In the Circuit Court of Cook
County, Appeal from Discharge Order Before the Police Board

Exhibit 63: OPS Report Closing Number of Allegations as Unsustained

Exhibit 64: OPS Report Regarding Eric Smith's Allegations

Exhibit 65: Terry Harris OPS statement

Exhibit 66: Diggins Statement

Exhibit 67: Report of the Special Prosecutor Part A

Exhibit 68: Report of the Special Prosecutors Part B

Exhibit 69: Report of the Special Prosecutors Part C

Exhibit 70: Report of the Special Prosecutors Part D

Exhibit 71: Report of the Special Prosecutors Part E

Exhibit 72: Report of the Special Prosecutors Part F

Exhibit 73: Report of the Special Prosecutors Part G

Exhibit 74: Report of the Special Prosecutors Part H

Exhibit 75: Report of the Special Prosecutors Part I

Exhibit 76: Report of the Special Prosecutors Part J

Exhibit 77: Report of the Special Prosecutors Part K

Exhibit 78: Report of the Special Prosecutors Part L

Exhibit 79: Report of the Special Prosecutors Part M

Exhibit 80: Report of the Special Prosecutors Part N

Exhibit 81: Report of the Special Prosecutors Part O

Exhibit 82: Report of the Special Prosecutors Part P

Exhibit 83: Report of the Special Prosecutors Part Q

Exhibit 84: Report of the Special Prosecutors Part R

Exhibit 85: Commendations (Filed Under Seal)

Exhibit 86: Memorandum and Order In Re Appointment of
Special Prosecutor, Dated May 19, 2006

Exhibit 87: City Memorandum in Opposition to Motion to Bar Testimony,
Dated Jan. 22, 1992

Exhibit 88: Statement of Mayor Richard M. Daley

Exhibit 89: Darrell Cannon OPS File

Exhibit 90: Philip Adkins OPS File

Exhibit 91: Gregory Banks OPS File

Exhibit 92: Stanley Howard OPS File

Exhibit 93: Michael Johnson OPS Report

Exhibit 94: LC Riley Testimony, Dated Mar. 13, 1987

Exhibit 95: Affidavit of Leanoard Kidd

Exhibit 96: Report of Proceedings, *People v. Holmes*, Testimony of Lonza Holmes, Dated Dec. 12, 1985 and Report of Proceedings, Testimony of Lonza Holmes, Dates June 26, 1986

Exhibit 97: Report of Proceedings, *People v. Andrews*, Testimony of James Andrews, Dated Oct. 1, 1984

Exhibit 98: Report of Proceedings, *People v. Coleman*, Testimony of Michael Coleman, Dated Nov. 20, 1980

Exhibit 99: Court-Reported Statement of Anthony Holmes

Exhibit 100: Transcript of Proceedings, Judge Lefkow Sentencing Jon Burge, Dated Jan. 21, 2011

Exhibit 101: Transcript of Proceedings, Adam Green Testimony, Filed July 1, 2011

Exhibit 102: Affidavit of Flint Taylor

Exhibit 103: Chicago Police Department Statistics for 1973

Exhibit 104: Chicago Police Department Statistics for 1974

Exhibit 105: Chicago Police Department Statistics for 1975

Exhibit 106: Chicago Police Department Statistics for 1976

Exhibit 107: Chicago Police Department Statistics for 1977

Exhibit 108: Chicago Police Department Statistics for 1978

Exhibit 109: Chicago Police Department Statistics for 1979

Exhibit 110: Chicago Police Department Statistics for 1980

Exhibit 111: Chicago Police Department Statistics for 1981

Exhibit 112: Chicago Police Department Statistics for 1982

Exhibit 113: Chicago Police Department Statistics for 1983

Exhibit 114: Chicago Police Department Statistics for 1984

Exhibit 115: Chicago Police Department Statistics for 1985

Exhibit 116: Chicago Police Department Statistics for 1986

Exhibit 117: Order of Hon. Paul Biebel Appointing Special Prosecutor,
Dated April 11, 2013

RESPECTFULLY SUBMITTED,

/s/ David B. Owens
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CERTIFICATE OF SERVICE

I, Russell Ainsworth, an attorney, certify that I served the foregoing Exhibit Listto all Counsel of Record by electronic means on April 15, 2013.

/s/ David B. Owens
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